

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE MUNICIPAL DERIVATIVES ANTITRUST  
LITIGATION

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

MDL No. 1950

Master Docket No. 08-02516 (VM) (JCF)

**Notice of Class Plaintiffs' Motion to  
Protect the Interests of the Putative  
Class and Preserve This MDL Court's  
Jurisdiction and for Addition of  
Necessary Parties.**

CLASS ACTION

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, on this 29<sup>th</sup> day of January, 2011, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, Class Plaintiffs, based the accompanying Memorandum and the other materials submitted in support of this motion, shall ask the Court, in order to preserve its ability to render meaningful relief on the claims before it, to exercise its equitable and/or legal authority to defendant Bank of America ("BoA"). from interfering with Class Plaintiffs' good faith efforts to settle the claims before this Court and for alternative relief under Fed. R. Civ. P. 23. Class Plaintiffs also request that the Attorneys General for the 20 (now 21) states who entered into the December 7, 2010 settlement agreement with BoA be added as necessary parties under Fed. R. Civ. P. 19.

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